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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re Apple iPhone Antitrust Litigation

Case Nos. 4:11-cv-06714-YGR
4:19-cv-03074-YGR

**STIPULATION AND ~~[PROPOSED]~~ ORDER
ON DEFENDANT APPLE INC.'S
ADMINISTRATIVE MOTION TO CLARIFY
ORDER RE: PENDING ADMINISTRATIVE
MOTIONS TO SEAL**

DONALD R. CAMERON, *et al.*,

Plaintiffs

v.

APPLE, INC.,

Defendants

The Honorable Yvonne Gonzalez Rogers

1 WHEREAS on December 6, 2021, the Court entered its Order on pending motions to seal in
 2 *Cameron v. Apple*, Case No. 4:19-cv-03074-YGR [Dkt. 498] (the “Order”), following the parties’ Joint
 3 Statement Regarding Pending Motions to Seal filed on November 1, 2021 [Dkt. 441];

4 WHEREAS at page 23 of the Order, the Court entered “n/a report ends at Paragraph 229” with
 5 regard to Apple’s sealing requests for Paragraphs 286 and 301 of the Schmalensee Expert Report,
 6 originally filed at Dkt. 376-8;

7 WHEREAS the paragraph numbering in the Schmalensee Expert Report continues into the
 8 appendices of the Report in the same PDF document;

9 WHEREAS Apple respectfully requests that the Court clarify that Apple’s Motion to Seal the
 10 information in Paragraphs 286 and 301 [*see* Dkts. 436, 441] is granted;

11 WHEREAS also at page 23 of the Order, the Court granted Apple’s sealing request as to
 12 information in Footnote 194 of the same Schmalensee Expert Report;

13 WHEREAS Apple had inadvertently withdrawn its sealing request in Paragraph 123 for that
 14 same piece of information in the parties’ Joint Statement [Dkt. 441];

15 WHEREAS Apple respectfully requests that the Court clarify its Order to grant Apple’s Motion
 16 to Seal as to the second piece of information highlighted in Paragraph 123 [*see* Dkt. 436];

17 WHEREAS the three pieces of information in the Schmalensee Expert Report Apple seeks to
 18 seal at Paragraphs 123, 286, and 301 are also presented for the Court’s consideration in the parties’
 19 joint sealing submission in *In re Apple iPhone Antitrust Litigation*, Case No. 4:11-cv-06714-YGR,
 20 filed on December 3, 2021 at Dkt. 617, and these clarifications apply in that case, as well;

21 IT IS HEREBY STIPULATED that Apple’s motion is unopposed, and that the information
 22 Apple seeks to seal in the Schmalensee Expert Report at Paragraphs 123, 286, and 301 should be sealed
 23 by the Court and inaccessible in the public record of these actions.

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IT IS SO STIPULATED AND AGREED.

Dated: December 20, 2021

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: ~~December~~, 2021
May 23, 2022


HON. YVONNE GONZALEZ ROGERS
United States District Court Judge